

Spokane River Instream Flow Rule Comments -- CR102 -- Su

Based on Spokane River Instream Flow Rule Comments -- CR102

First Name	Last Name	Organization
Lynn	Wells	
Lynn	Wells	
Marc	DeLateur	

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Comment	Attach File
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You can use this area to provide your comments.

If you have input about a specific section of the draft rule, please check the box(s) above.

If you prefer to attach a comment letter use the Attach File option, below.

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I was recently made aware of this proposal by the Sierra Club, which makes note that a very low volume of inflow has been slated for the Spokane River under this proposal, to the tune of 850 cfs, and that the measures, if passed, give Spokaneites far less protection than other watersheds in Washington. I'd like to know why that is, exactly, and if you don't have a good reason, I suggest you amend this

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Aimee

Cervenka

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proposal to give Spokane protections that are consistent with all other water protections throughout the State of Washington. Water is life, after all, and I take threats to my well-being very seriously. Please read the blog located at <http://naiads.wordpress.com/> for a detailed explanation of the concerns that all informed Spokaneites should have about the proposal as it currently stands, and ignore whatever percentage of our population that might be. Just as a small number of very wealthy people can create massive imbalances in society, a small number of people with intellectual acuity can restore it. Sincerely, Marc DeLateur

Thank you for drafting a rule for the Spokane River. This is a step in the right direction. However, the proposed flows are way too low. Experts with independent organizations such as Sierra Club are recommending a flow of 2,500 cubic feet per second during summer months as a flow that will protect fish, boaters, and businesses that depend on the river. Washington

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Walther Thomas

Soeldner

Systems Coaching LLC

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State should make sure to protect the Spokane River in when water is allocated between Washington and Idaho: the proposed flow would be a major giveaway of water to Idaho. I offer sincere thanks to the Department of Ecology for drafting a rule for the Spokane River, not least because instream flow rules create a "water right for the river" that prevents allocation of future water rights that harm stream flows. Such a right is vital for the future health of the river.

That said, I cannot understand why Ecology has proposed such a low instream flow (850 cfs) for flows below the Monroe St. dam during the summer months. Surely a "water right" for the river should assure the river's health and thereby the maintenance of normal river use for all the river's natural dependents.

A summer flow of 850 cfs below Monroe Street is not sufficient for the

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redband trout which use the river for spawningâ€”excuses to the contrary by Ecology are scientifically bogus. Nor does such a low flow allow for the river's popular recreational use by boaters, paddlers, and floaters. Ecology has done no research or outreach to these user communities as to needed flows.

In addition, Washington and Idaho are heading for a clash as to how much Spokane River instream and outstream water each state is entitled to. By picking low numbers Ecology is putting our state's negotiating position in serious jeopardy, and seemingly ignoring interstate sovereignty issues, which incidentally also seem to be off the governor's radar.

Finally, why does Ecology use different methods to establish instream flows for the Spokane River watershed than they do for other state watersheds? In other watersheds flows are protected in nine out of ten

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laura

crafton

none

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Hello,

I know these are pasted in but it is worded so well I decided to go with it.

(1) Thank the Department of Ecology for drafting a rule for the Spokane River, but note that the proposed flows are way too low.

(2) Recommend a flow of 2,500 cubic feet per second during summer months as a flow that will protect fish, boaters, and businesses that depend on the river (the state is proposing a mere 850 cfs).

(3) Washington State needs to protect the Spokane River in when water is allocated between Washington and Idaho: the proposed flow is a major giveaway of water to Idaho.

Thanks,

Laura Crafton

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Aaron

Banks

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Thank you for drafting legislation that works to protect such a valuable resource as the Spokane River.

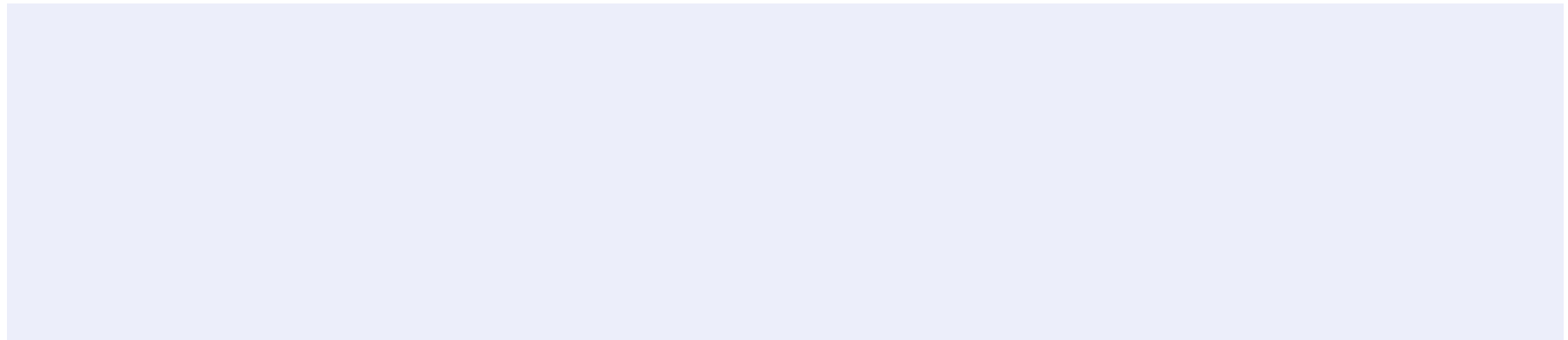
I have a concern and wish to comment on the instream minimum flow of 850 cfs. These flows are too low and will not sustain a healthy habitat for native species of fish and wildlife. My proposal would be for flows at 2500 cfs.

Please protect this valuable resource and manage it sustainably regardless of water rights that Avista or Idaho may have. The Spokane River should have the first and ultimate water right.

I'm dumbfounded that a river that once could support thousands of fish per mile and the return of salmon and steelhead is now a crippled fraction of what it used to be. The state should consider the thousands of pristine river miles available to us yet we offer residents one "blue ribbon" fishing experience.

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Richard

Rush

Karen

Lahey

Huron Valley Software Consulting

David

Dunphy

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I look forward to continuing to be an active proponent of the Spokane River. Please keep citizens informed and extend the comment period for a suitable number of comments.

Regards,
-Aaron Banks

Please adopt an in-stream flow rule that: 1) ensures healthy fish (particularly redband trout) populations and 2) provides year-round recreational opportunities. A positive margin of error (+15%) should also be added to the minimum instream flow to ensure the above goals are met.

This rule does not go far enough to protect our water rights in the Spokane River. Please do not give away our water to Idaho.

Department of Ecology,

I'm writing you in concern about the proposed stream flows for the Spokane river. I encourage the department to under take a more comprehensive

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Kerry

Peterson

Citizen

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review to find the optimal flow to protect recreation and fish habitat on the river. This should also take in account the water used on the Idaho side of the border. When living in Spokane the river was source of wonderful recreation and renewal; I hope the new stream flow rules will provide this for future generations of people and wildlife.

David

I urge the Department of Ecology to not adopt the currently proposed rule, and instead undertake studies to determine the optimal flows for fish and recreation. It is necessary, but not sufficient, that proposed flows be sustainable. Including a factor of safety or margin of error related to changing climate impacts on water resources is prudent.

As a professional engineer specializing in water resources, I care about the Spokane River. As a recreational angler, I care about the Spokane River.

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Proposed summer season flows do not have a sound biological basis to protect redband trout, the Spokane River's signature wild fish.

The Department of Ecology completely failed to study recreational flows, despite the Spokane River's tremendous popularity with boaters. These studies are needed!

Ecology must also assess how the instream flow rule will affect future interstate allocation with Idaho. Idaho will take all water not claimed in Washington's flow rule. Ecology needs to assess the interstate allocation implications of its flow rule. Again, biological and recreational bases for instream flow need to be considered.

This opportunity to protect Washington's sovereign waters should not be squandered. Georgia and Florida recently ended up in the

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Lydia

Garvey

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The proposed flows are unacceptable.

It is imperative to study flows for recreation and scenic beauty.

Fish studies must be tailored to the Spokane's unique habitat and redband trout species.

This rule has negative interstate water allocation consequences

I very much care about the Spokane River, Washington's instream flow program, and the future of our rivers.

Your attention to this most urgent matter would be much appreciated by all present & future generations of all species.

Thank you

Lydia Garvey

Public Health Nurse

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Fred

Struck

self

Bob

Mirasole

Backcountry Hunters and Anglers WA. Chapter

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Your proposed Spokane River flow is ridiculous. It should be greatly increased to make sure that habitat for various species, especially fish, is sufficient for a healthy population. The flow should be based on science rather than user (water drawer's) wants.

The Washington State Chapter of Backcountry Hunters and Anglers, would like to thank WA. state Dept. of Ecology for the opportunity to comment on the Spokane River Flows Need Protection.

WA. State chapter of Backcountry Hunters and Anglers(BHA) work across the state of WA. to pass on opportunities for solitude, physical challenge and healthy populations of fish and wildlife. We focus on responsible access to public lands and waters.

BHA supports the science in the determining the minimum river flows. We also support the WA. State Dept. of Fish and Game that the minimum flows meet the fisheries and habitat needs.

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Joshua

Hardy

Spokane Falls Trout Unlimited

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As a regular user of the Spokane River it is imperative that river flows are determined by fisheries requirements and recreational users. All state and federal laws be complied with prior to the rule making.

Howdy! I think the minimum instream flow level of 850/cfs for the Spokane River is ridiculously low!

This river is vital to our area in many ways including tourism, boating and kayaking, fishing, and most importantly, our overall environmental quality!

Please consider all the different people who enjoy this river on a daily basis, not to mention the native redband trout population and keep at least 2500/cfs of instream flow in our river!

I hope you listen to all of us who care about our Spokane River and keep it flowing!

Sincerely, Josh Hardy

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B.J.

Kieffer

Spokane Tribal Natural Resources Department

Bill

Clarke

Realtors and Homebuilders Associations

Jon

Wilmot

FLOW Adventures

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See attached letter

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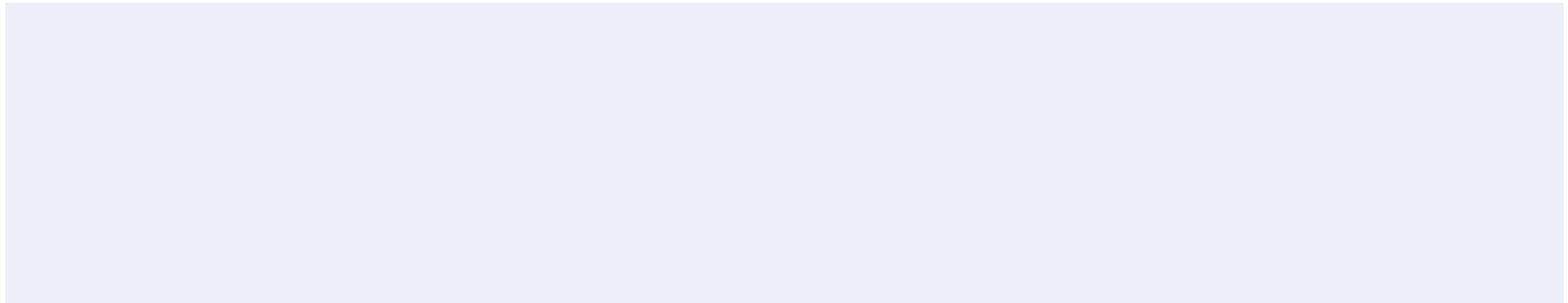
See attached letter

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and
Homebuilders
Associations
comments.pdf](#)

The flow level that the Department of Ecology has chosen does not permit adequate water for safe recreational use through the Bowl & Pitcher and Devil's Toenail rapids in Riverside state park. It also does not supply enough water for the aesthetic views of those using one of our largest state parks and Spokane's water jewel. The more acceptable low flow level would be between 3000 to 3500 CFS as most regular users and outfitters would say. The small business impact statement definitely did not consider Outfitters on this section of river. Our business provides local jobs, recreational opportunity to the local community and

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Vicki

Egesdal

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opportunity to the local community and tourism by showcasing the river. My business was never approached by those writing this statement or the Department of Ecology. The flow of 850 cfs would have a negative impact on my business and the experience of local tourists.

I disagree with the proposed minimum instream flow for the Spokane River. It is not acceptable for recreational use nor does it offer acceptable aesthetics. I don't believe it meets the habitat needs for wildlife, not even the only two fish species that were considered.

[20130928_124004-1.jpg](#)

I am a rafter and help organize the Upriver Scrub held on the last Saturday of September. Volunteers take their rafts on the river picking up garbage and other debris. See attached photo. At the proposed flows we wouldn't be able to put boats on the water.

I request that more information be gathered before setting the minimum

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Rachael

Osborn

Gunnar

Holmquist

Spokane River shoreline resident

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flow level. The study done so far is not complete.

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If you prefer to attach a comment letter use the Attach File option, below.

[RPO Spokane
Flow Letter \(11-
6-14\).pdf](#)

Dear Department Of Ecology,

I have lived on the shore of the Spokane River for 20 years, just a few hundred feet downstream from the Monroe Street dam and Avista power station in downtown Spokane. I walk the river's edge nearly every day of the year. There are osprey in the Spring and Summer and bald eagles in the Fall and Winter, there are herons, kingfishers and many other species of birds, there are otters all year, and many other mammals that now use the river corridor as their primary habitat and food source, and there are the thousands of species of fish, reptiles, amphibians, insects,

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macroinvertebrates, plants, fungi, and algae that totally rely on the health of this riparian ecosystem, all of which is dependent on the quantity of water flow and the natural timing of that flow. Now you are faced with determining the fate of this ecosystem, which will be more unstable as climate temperatures continue to increase for decades to come.

Historically, the fate of water flows everywhere has been determined by the power and influence of corporate users and withdrawers of river water. Avista in particular has maintained great fortune by dominating the decision process locally. But the river doesn't belong to corporations and users. The river has rights itself, to thrive and maintain its balanced system of interdependence of all these living species that must have adequate flows, and proper timing of those flows. If the water itself "belongs" to anyone it belongs to the people and communities of the area, which must act as

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AI

French

Office of Spokane County Commissioners

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See attached letter

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County
Commissioners
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Emilee

Syrewicze

Center for Environmental Law & Policy

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To whom it may concern,

This appeal is intended to be a public comment opposing the adoption of the Spokane River Instream Flow Rules as contained in 173-557.

Please do not adopt the Spokane River instream flow rule as it is. The proposed rule fails to protect flows that are needed for fish. The protection of our river wildlife is an absolutely integral part of our natural economy. In addition, the agency has failed to study flows needed for recreation, aesthetics and water quality. The agency did not consider all economic impacts, including impacts on local businesses such as outfitters and gear shops. If measures need to be instated, let them be based on the most current research and data driven outcomes. The Spokane River is a beautiful river, worth protecting.

Thank you so much for your consideration.

Kind Regards,

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Cindy

Alia

Citizens' Alliance for Property Rights (CAPR)

Lynn

Mrzygod

Spokane Canoe &Y Kayak Club

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Emilee Syrewicze, JD

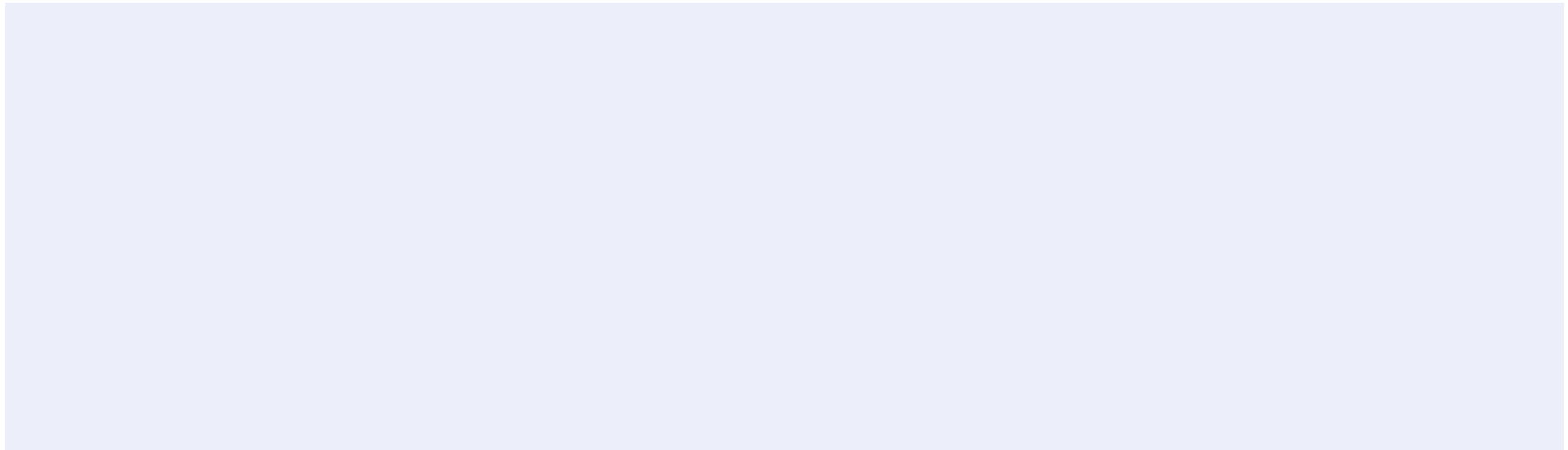
See attached letter

[C:\Spokane
rule\Citizens'
Alliance for
Property Rights
\(CAPR\)
comments.pdf](#)

The Spokane Canoe & Kayak Club supports the concept of establishing instream flow levels necessary to protect wildlife, fish, scenic, aesthetic, RECREATIONAL values, etc. as stated in the proposal. As one of the Spokane River's "user groups" we would recommend an increase in the instream flow rate as measured at the Greenacres (Barker Road) USGS gauge #12420500 from the proposed 500 cfs between June 16 to September 30 to 1200 cfs. Specified cfs are too low to support recreational use of the river to canoes, kayaks, paddle boards and inflatable watercraft. 1200 cfs would open approximately 12 river miles between State Line on the east to Plante's Ferry Park to the west to paddlecraft during the prime

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Pam

Gallaher

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paddlecraft during the prime summertime river running season, an addition of 107 days. Tens of thousands of "on-water" recreational hours would be gained as a result "opening" the river in the time of the year when temperatures are at their hottest and daylight hours their longest.

Thank you for accepting public comments in your decision making process.

Dear Ms. Wessel -

I had the pleasure of rafting the Spokane River twice this summer for the first time in years. The first trip was at the end of June. With water levels dropping, ours was to be the last trip on that stretch of the river for the summer. This despite the fact that there were two more months of hot summer weather ahead of us.

The second was with my entire family just two weeks later. We rafted a stretch closer to town but even then

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Mariah

McKay

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the river was so low the outfitters were not sure how much longer they would be able to safely float the river.

I was happy to hear that the Department of Ecology is working on Instream Flow Rules to ensure enough water to keep the Spokane River a raftable, swimmable, fishable river year round. Unfortunately, the recommended summer level will be below where it was when I was on the river this year, meaning that it will not keep the Spokane River raftable.

Please reconsider the flow rates to protect the future of our river.

Sincerely,

Pam Gallaher
Spokane Valley, WA

Dear Ms. Wessel,

I am writing to offer comment on the recent draft instream flow minimums

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for the Spokane River. In short, I believe the proposed levels are irresponsibly low. Our community in Spokane needs the Department of Ecology's help in holding ourselves to a higher standard.

Spokane has some of the highest water consumption rates per person in the state and we can do much better to preserve higher flows in our river. In Spokane people waste thousands of gallons over-watering lawns in the summer, washing vehicles and filling and emptying personal pools on a regular basis.

Our water is artificially cheap and our population has been given no real financial incentive to preserve water resources. Pressures on water use will only increase as our population grows, weather gets hotter, and commercial interests are invited to take further and further advantage of our artificially "cheap and available" water supply. Insects and plants need more river

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Christopher

Lawrence

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I care about the future of the Spokane River and that 850 cfs during the summertime is not enough water for the future of a fishable, swimmable, boat-able Spokane River. This recommended summer flow of 850cfs gives away the future of our river to the forces of rampant over-consumption. The authority and purpose of the instream flow rule is to protect ecological values, aesthetic values and recreational values for future generations of river-users. This has never been so important as it is in an age of global climate change. The Spokane River and our community deserve flow recommendations that truly protect the future of our river. You must do better.

Christopher Lawrence
19 East 32nd Avenue
Spokane, WA 99203

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W. Thomas

Soeldner

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Dear Ms Wessel--

I have lived in Spokane County for fifteen years--6.5 years of that in the city of Spokane. The Spokane River is very important to me.

I offer sincere thanks to the Department of Ecology for drafting a rule for the Spokane River, not least because instream flow rules create a "water right for the river" that prevents allocation of future water rights that harm stream flows. Such a right is vital for the future health of the river.

That said, I cannot understand why Ecology has proposed such a low instream flow (850 cfs) for flows below the Monroe St. dam during the summer months. Surely a "water right" for the river should assure the river's health and thereby the maintenance of normal river use for all the river's natural dependents.

A summer flow of 850 cfs below Monroe Street is not sufficient for the redband trout which use the river for spawning--"excuses to the contrary by

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Tracy

Tardiff

Sierra Club

Carol

Reynolds

Sierra Club

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Nov 4, 2014

Director, Washington State
Department of Ecology Maia Bellon

Dear Director, Washington State
Department of Ecology Bellon,

Please protect the Spokane River, and
do what the Department of Ecology
failed to do. Please set the
summertime low flow at the 2,500 cfs.
Thank you for protecting the river!

Sincerely,

Ms. Tracy Tardiff
747 Broadway
Seattle, WA 98122-4379
(206) 380-6837

Nov 3, 2014

Director, Washington State
Department of Ecology Maia Bellon

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Dear Director, Washington State
Department of Ecology Bellon,

Every river is important. The Spokane River is the life blood of our area and in danger. I run, walk and ride along this beautiful river hundreds of times during the year and long to see it protected. Thousands of others use the water as a place to rest and relax during hot summer months. Fish, creatures of many shapes and sizes and wildlife depend on this river not only for their lives but the lives of their offspring.

Why when we now KNOW the importance of keeping water flow at a level of 2,500 cfs to protect this river and all of the life that depends on it, would we set it at 850 cfs in the summer? Have we not learned these lessons yet? Surely, we know and can do better.

For the Spokane River, no flow rule is better than a bad rule. I ask that you

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Dan

Schnell

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Thank You, I forgot to include my flow preferences, I feel the absolute lowest flow would be 1,000 CFS, I would like to see 2,500 CFS. I feel that lower flow levels would have an impact on residences and visitor's perception of Spokane.

From: Wessel, Ann (ECY)
[mailto:awes461@ECY.WA.GOV]
Sent: Wednesday, November 05, 2014
9:20 AM
To: Dan Schnell
Subject: Automatic reply: Spokane
River Flow

Hello, if you are commenting on the proposed Spokane River instream flow rule, Ecology has received your email and we thank you for commenting.

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Allan

Scholz

Eastern Washington University

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No virus found in this message.

From: Scholz, Allan

Sent: Wednesday, October 22, 2014

10:31 AM

To: WDOE and WDFW

Subject: RE: Spokane River Instream
Flow rule

Dear Evaluators:

From what I can tell, the IFIM study on the Spokane River used standardized habitat data (curves) that has been published for rainbow (redband) trout and mountain whitefish, which they then incorporated to calculate weighted usable area. I think that this is the case but can't actually tell because they did not cite the appropriate papers and instead relied on a WDFW/WDOE catch all document. I further assume that the WDFW/WDOE document relied on previously published data for RBT and MWF. If this assumption is correct then I think that the IFIM

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doesn't hold up very well because the habitat in the Spokane River is unlike most rivers in which you find RBT and MWF (upon which the standardized habitat curves are based). The IFIM guidelines state that when this occurs using the standardized curve for a species may not work well and they recommend that data be collected to assess the habitat utilization by each target species in the river in question. I have been involved in two IFIM studies and in both of them we collected habitat information about all target species so we would not have to use the published standard habitat curves, rather we used curves that were specific to the river that we were studying. This apparently was not done in the Spokane River IFIM because no appendices of data were attached that suggested that these types of data had been collected. Thus, I think that the results of this IFIM may be misleading. I recommend that RBT and MWF focal point data be collected for an adequate sample of

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Rachael

Osborn

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Ann and Chris,

I just attempted to use the on-line comment system and received an error message that is attached as a pdf. Again, please call me first thing in the morning. 509-954-5641.

Also, please add this message to the rule-making record.

Thanks,

~ Rachael Osborn

From: Rachael Osborn
[mailto:rdpaschal@earthlink.net]
Sent: Sunday, November 02, 2014
6:14 PM
To: 'ann.wessel@ecy.wa.gov';
'cand461@ecy.wa.gov'
Subject: Urgent - Spokane River rule
comment form
Importance: High

Ann & Chris â€“

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A large number of people will be sending you comments this week regarding the Spokane River rule. At your request, we are directing people to the on-line comment form. However, as noted in an e-mail you just received from John Townsell, the form is not working.

It is essential that people who want to comment on the rule be able to do so successfully and without difficulty. I would like to discuss with you tomorrow morning (Monday, 11/3/14) whether CELP and other groups should cease asking their members to use the on-line form for commenting. It is simply unacceptable that public comments might be lost due to technical difficulties.

I appreciate your immediate attention to this matter. Please call me when you receive this e-mail.

Best,

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Louise

Zovanyi

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Thank you for drafting a rule for the Spokane River, but the proposed flows are way too low.

A flow of 2,500 cubic feet per second is recommended during summer months as a flow that will protect fish, boaters, and businesses that depend on the river (the state is proposing only 850 cfs).

Washington State needs to protect the Spokane River when water is allocated between Washington and Idaho: the proposed flow is a major giveaway of water to Idaho.

Our rivers are one of our most valuable assets. As climate change effects runoff levels and rainfall quantities it will be especially important that we manage this natural resource and all its effects.

Thank you for your foresight and please continue this protection of our rivers.

Regards,

L. Zovanyi

700 W. 7th Ave.

Spokane, WA 99204

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Timothy

Coleman

Sierra Club

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Nov 4, 2014

Director, Washington State
Department of Ecology Maia Bellon

Dear Director, Washington State
Department of Ecology Bellon,

I'm writing to express my views about
the magnificent Spokane River .
It's a treasure. When visiting Spokane,
my family and I enjoy walking along the
river and especially we enjoy the
waterfalls.

I understand that DOE is considering
setting summertime river flow levels of
850 cfs. this would significantly reduce
river flows, altering waterfalls, river
ecology and recreation uses. The
Department failed to analyze flows
needed for recreational use of the
river. .

River flows of 850 cfs will lead to

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Marilyn

Darilek

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increased water temperatures that in
all probability could lead to the death of
cold water fish and environmental
damage to other aquatic species
(bugs, amphibians, etc.).

For the Spokane River, no flow rule is
better than a bad rule - period.

Washington State is effectively giving
away the river to Idaho that will claim
all water not protected by
Washington's flow rule. I ask that you
either set the summertime low flow at
the protective level of
2,500 cfs, or withdraw the rule
altogether.

The Spokane River is a remarkable
river - let's keep it that way.

Sincerely,

Mr. Timothy Coleman
30 Horseshoe Ln
Republic, WA 99166-9537
(509) 775-2017

As a long-time resident of Spokane, I

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Dan

Schnell

Mike

Conaboy

Sierra Club

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care about the health of our river & the watershed environment. Please increase the summertime flow to 2500 feet per second not only for the aesthetic value but also for fish & other aquatic life that depend on adequate amounts of cool water. We had several groups of out-of-state visitors this summer - all of them commented on the intrinsic value of the river to our city and surrounding communities. Thank you!

Marilyn Darilek
1814 W Briarcliff Lane
Spokane WA 99208
(509) 328-7750

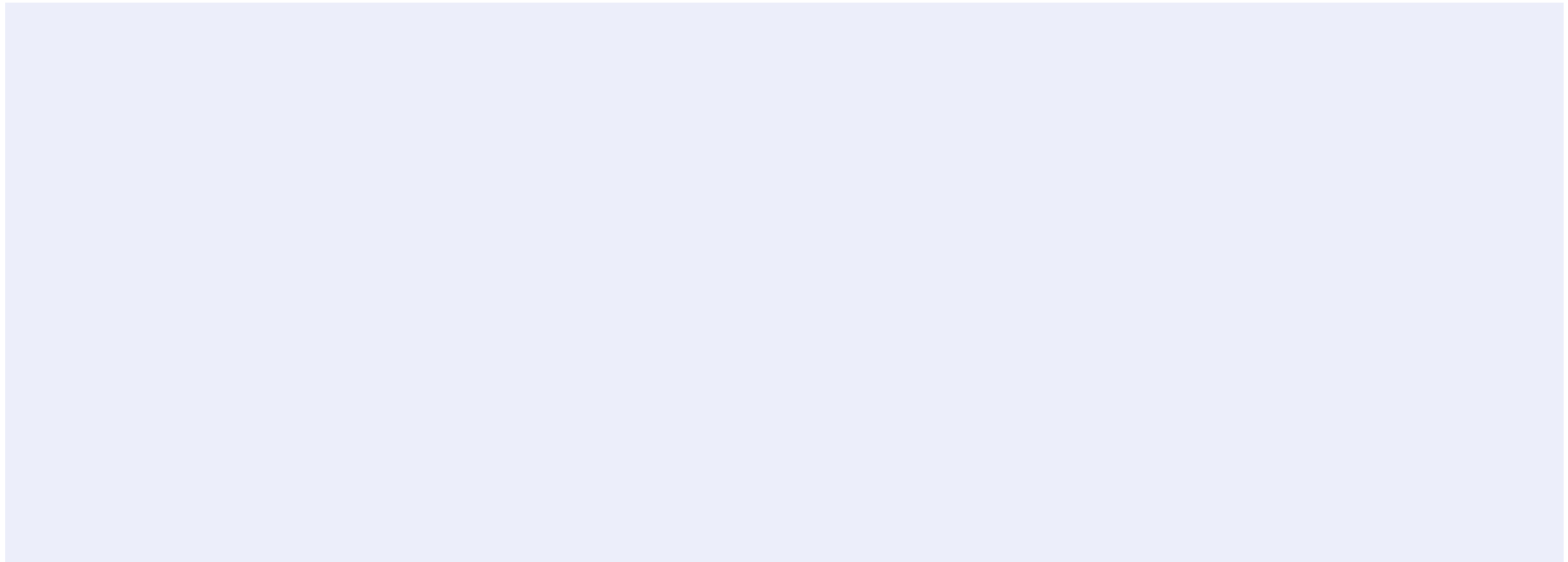
Feedback- The proposed summer river flow for of 850cfs appears to be too low. Thank-you Dan Schnell, 924 W.17th ,Spokane, WA,99203

Nov 3, 2014

Director, Washington State
Department of Ecology Maia Bellon

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Lynda

Roberts

Sierra Club

Spokane River Instream Flow Rule Comments -- CR102 -- Su

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Dear Director, Washington State
Department of Ecology Bellon,

Plans look good to me. Too much
damn water here in Washington
anyway - you Califmorons just wouldn't
understand.

Sincerely,

Mike Conaboy
5501 Ken Jan Ct SE
Lacey, WA 98503-5502
(360) 866-2043

Nov 4, 2014

Director, Washington State
Department of Ecology Maia Bellon

Dear Director, Washington State
Department of Ecology Bellon,

I hope you are paying attention to the
long term problems that will result from
this bad decision. It is up to you! The
Spokane River is one of Washington's

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most important rivers. During hot summer months, thousands of people turn to the river for relief and recreation. Fish and wildlife depend on this river: water is life.

Setting summertime flows at 850 cfs would be a debacle for the Spokane River -- and risk rivers statewide. The Department of Ecology failed to analyze flows needed for recreational use of the river. The proposed flow does not have a sound biological basis to protect redband trout, the Spokane River's signature wild fish.

By low-balling the flow, Washington State is effectively giving away the river to Idaho the upstream state that will claim all water not protected by Washington's flow rule.

For the Spokane River, no flow rule is better than a bad rule. I ask that you either set the summertime low flow at the protective level of 2,500 cfs, or withdraw the rule

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Bruce

Pringle

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Nov 3, 2014

Director, Washington State
Department of Ecology Maia Bellon

Dear Director, Washington State
Department of Ecology Bellon,

The Spokane River is one of
Washington's most important rivers.
During hot summer months, thousands
of people turn to the river for relief and
recreation. Fish and wildlife depend on
this river: water is life.

Setting summertime flows at 850 cfs
would be a debacle for the Spokane
River -- and risk rivers statewide. The
Department of Ecology failed to
analyze flows needed for recreational
use of the river. The proposed flow
does not have a sound biological basis
to protect redband trout, the Spokane
River's signature wild fish.

By low-balling the flow, Washington
State is effectively giving away the

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Jamie

Donaldson

Sierra Club

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will claim all water not protected by
Washington's flow rule.

For the Spokane River, no flow rule is
better than a bad rule. I ask that you
either set the summertime low flow at
the protective level of
2,500 cfs, or withdraw the rule
altogether.

As goes the Spokane Rivers, so goes
the other rivers of Washington State.
Please take steps to protect this
important river.

Sincerely,

Dr. Bruce Pringle
816 S 216th St
T438
Des Moines, WA 98198-6331
(206) 870-8438
Nov 3, 2014

Director, Washington State
Department of Ecology Maia Bellon

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Dear Director, Washington State
Department of Ecology Bellon,

I am a native of Spokane, and I so love
and appreciate its great river.

As you know, the Spokane River is one
of Washington's most important rivers.

During hot summer months, thousands
of people turn to the river for relief and
recreation. Fish and wildlife depend on
this

river: water is life.

Setting summertime flows at 850 cfs
would be a debacle for the Spokane
River -- and risk rivers statewide. The
Department of Ecology failed to
analyze flows needed for recreational
use of the river. The proposed flow
does not have a sound biological basis
to protect redband trout, the Spokane
River's signature wild fish.

By low-balling the flow, Washington
State is effectively giving away the
river to Idaho the upstream state that

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James

Lanz

Sierra Club

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Nov 3, 2014

Director, Washington State
Department of Ecology Maia Bellon

Dear Director, Washington State
Department of Ecology Bellon,

As an avid outdoors person,
recreational kayaker, hiker & birder, I
am very concerned about Dept of
Ecology setting an inadequate stream
flow for the Spokane River. This river
is one of Washington's most important
rivers. During hot summer months,
thousands of people turn to the river
for relief and recreation. Fish and
wildlife depend on this river: water is
life.

Setting summertime flows at 850 cfs
would be a debacle for the Spokane
River -- and risk rivers statewide. I
believe it would set a dangerous
precedent that could adversely affect
rivers statewide including those in SW
Washington because the Department

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of Ecology failed to analyze flows needed for recreational use of the river. The proposed flow does not have a sound biological basis to protect redband trout, the Spokane River's signature wild fish.

By low-balling the flow, Washington State is effectively giving away the river to Idaho the upstream state that will claim all water not protected by Washington's flow rule.

For the Spokane River, no flow rule is better than a bad rule. I ask that you either set the summertime low flow at the protective level of 2,500 cfs, or withdraw the rule altogether.

As goes the Spokane Rivers, so goes the other rivers of Washington State. Please take steps to protect this important river.

Sincerely,

Spokane River Instream Flow Rule Comments -- CR102 -- Su

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Robert

Sendrey

Sierra Club

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Nov 3, 2014

Director, Washington State
Department of Ecology Maia Bellon

Dear Director, Washington State
Department of Ecology Bellon,

The Spokane River is one of
Washington's most important rivers.
Fish and wildlife depend on this river:
water is life. During hot summer
months, thousands of people turn to
the river for relief and recreation.

Setting summertime flows at 850 cfs
would be a debacle for the Spokane
River -- and risk rivers statewide. The
proposed flow does not have a sound
biological basis to protect redband
trout, the Spokane River's signature
wild fish. The Department of Ecology
failed to analyze flows needed for
recreational use of the river.

By low-balling the flow, Washington
State is effectively giving away the

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Jule

Schultz

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river to Idaho the upstream state that will claim all water not protected by Washington's flow rule. For the Spokane River, no flow rule is better than a bad rule. I ask that you either set the summertime low flow at the protective level of 2,500 cfs, or withdraw the rule altogether.

As goes the Spokane River, so goes the other rivers of Washington State. Please take steps to protect this important river.

Sincerely,

Mr. Robert Sendrey
1401 Merrill Creek Pkwy
Everett, WA 98203-7133
unlisted

Thank you for the opportunity to comment on instream flow rule for the Spokane River. The Spokane River is the lifeblood of our community, supporting jobs, recreation, and aesthetic and natural values.

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Lorelei

Seifert

Sierra Club

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The proposed June 16th-September 30th flow of 850 cfs is too low to support the needs of the Spokane River. Those flows are too low to boat in the Spokane River. Allowing flows below 1500 cfs would negatively affect our whitewater and fishing economy, the recreationalists that depend on the river, and the aesthetic values that the community depends on.

Please consider raising the June 16th-September 30th flows to 1500-1800 cfs.

Thanks

Jule Schultz

Nov 4, 2014

Director, Washington State
Department of Ecology Maia Bellon

Dear Director, Washington State
Department of Ecology Bellon,

The Spokane River is one of
Washington's most important rivers.
During the summer, we use the river

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for relief and recreation. Fish and wildlife depend on this river.

Setting summertime flows at 850 cfs is insufficient for the Spokane River -- and risk rivers statewide. The Department of Ecology failed to analyze flows needed for recreational use of the river, nor does 850 cfs support biological criteria to protect and enhance habitat for redband trout, the Spokane River's signature wild fish.

By low-balling the flow, Washington State is effectively giving away the river to Idaho, the upstream state. Idaho will claim all water not protected by Washington's flow rule.

For the Spokane River, no flow rule is better than a bad, inadequate rule. I ask that you either set the summertime low flow at the protective level of 2,500 cfs, or withdraw the rule altogether.

As goes the Spokane River system, so

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Kimbo

May

Citizen

Spokane River Instream Flow Rule Comments -- CR102 -- Su

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The proposed flows for the Spokane River appears to be set drastically low and well below what is historically recognized even since dams were placed on the river. The flows the EPA is recommending are too low for several reasons.

1. HABITAT. The summer proposed flow will stress an already embattled wild, distinctive, trout population and force them to retreat into vulnerable concentrations in aquifer recharge areas. The flow proposed will cause water in much of the river to experience a drastically warmer temperature than nature intended. Fish without access to recharge areas will be threatened and invasive, warm water species will get an unintended benefit. I have personally experienced this trend with the current flows and it is alarming.

2. RECREATION, SAFETY, LITTER. These flows are too low for the many uses of the river in summer months.

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Boaters and floaters use this river a lot in the summer. It seems to be ever increasing too. More river users are utilizing the river outside of the summer months. Part of the draw has been the realization that this recreational resource is not a long drive away and is beautiful in the river corridor!

This has both positive and negative impacts. Lots of users means more people begin to appreciate and share concern for keeping it clean and useful. It also means people who do not always share those feelings may create more trash. Either way the low flow can actually be more dangerous than a higher flow. This is because the rock structure along much of the river includes basalt and well worn boulders. This river is one of the most slippery anywhere I have been and I have stood in many. Most casual, recreational floating is done in flimsy water craft and inner tubes. Many of these people do not wear appropriate footwear to deal with the slippery rock

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Nov 4, 2014

Director, Washington State
Department of Ecology Maia Bellon

Dear Director, Washington State
Department of Ecology Bellon,

The Spokane River is one of
Washington's most important rivers.
During hot summer months, thousands
of people turn to the river for relief and
recreation. Fish and wildlife depend on
this river: water is life.

Setting summertime flows at 850 cfs
would be a debacle for the Spokane
River -- and risk rivers statewide. The
Department of Ecology failed to
analyze flows needed for recreational
use of the river. The proposed flow
does not have a sound biological basis
to protect redband trout, the Spokane
River's signature wild fish.

By low-balling the flow, Washington
State is effectively giving away the

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Dean

Effler

Sierra Club

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river to Idaho the upstream state that
will claim all water not protected by
Washington's flow rule.

For the Spokane River, no flow rule is
better than a bad rule. I ask that you
either set the summertime low flow at
the protective level of
2,500 cfs, or withdraw the rule
altogether.

As goes the Spokane Rivers, so goes
the other rivers of Washington State.
Please take steps to protect this
important river.

Sincerely,

Ms. M. C. Paxson
PO Box 176
Pullman, WA 99163-0176
(509) 334-7174

Nov 3, 2014

Director, Washington State
Department of Ecology Maia Bellon

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Terrance

Peterson

Sierra Club

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Nov 4, 2014

Director, Washington State
Department of Ecology Maia Bellon

Dear Director, Washington State
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Based on Spokane River Instream Flow Rule Comments -- CR102

Stravo

Lukos

Sierra Club

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For the Spokane River, no flow rule is
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the protective level of
2,500 cfs, or withdraw the rule
altogether.

As goes the Spokane Rivers, so goes
the other rivers of Washington State.
Please take steps to protect this
important river.

Sincerely,

Mr. Terrance Peterson
5627 24th Ave NE
Tacoma, WA 98422-1567
(425) 633-4492

Nov 4, 2014

Director, Washington State
Department of Ecology Maia Bellon

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Dear Director, Washington State
Department of Ecology Bellon,

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By low-balling the flow, Washington
State is effectively giving away the
river to Idaho the upstream state that
will claim all water not protected by
Washington's flow rule.

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Andrew

Martin

Sierra Club

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Nov 4, 2014

Director, Washington State
Department of Ecology Maia Bellon

Dear Director, Washington State
Department of Ecology Bellon,

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Washington's most important rivers.
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of people turn to the river for relief and
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Linda

Milne

Sierra Club

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will claim all water not protected by
Washington's flow rule.

For the Spokane River, no flow rule is
better than a bad rule. I ask that you
either set the summertime low flow at
the protective level of
2,500 cfs, or withdraw the rule
altogether.

As goes the Spokane Rivers, so goes
the other rivers of Washington State.
Please take steps to protect this
important river. Thank you.

Sincerely,

Mr. Andrew Martin
15028 245th Ave SE
Issaquah, WA 98027-7355
Nov 5, 2014

Director, Washington State
Department of Ecology Maia Bellon

Dear Director, Washington State

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Department of Ecology Bellon,

The Spokane River is one of Washington's most important rivers. During hot summer months, thousands of people turn to the river for relief and recreation. Fish and wildlife depend on this river: water is life.

Setting summertime flows at 850 cfs would be a debacle for the Spokane River -- and risk rivers statewide. The Department of Ecology failed to analyze flows needed for recreational use of the river. The proposed flow does not have a sound biological basis to protect redband trout, the Spokane River's signature wild fish.

By low-balling the flow, Washington State is effectively giving away the river to Idaho the upstream state that will claim all water not protected by Washington's flow rule.

For the Spokane River, no flow rule is better than a bad rule. I ask that you

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John

Fair

Steve

Wright

Trout Unlimited, spokane Fly Fishers

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either set the summertime low flow at
the protective level of
2,500 cfs, or withdraw the rule
altogether.

As goes the Spokane Rivers, so goes
the other rivers of Washington State.
Please take steps to protect this
important river.

Sincerely,

Ms. Linda Milne
5446 35th Ave SW
Seattle, WA 98126-2822

The proposed instream flow minimums
are too low to support river recreation
during the summer months. The
counter-proposal in many of these
public comments of a 2,500 cfs
minimum flow is a much better target
to keep river recreation feasible
throughout the year.

I am writing this to ask that you DO
NOT adopt the current proposed
stream flow rule and take the time to

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do proper studies to insure that the flows are correct for the fish and all users of the river. Below are some specific concerns.

1 - There is not sound biological basis or study to protect the redband trout. It is a very special wild fish native to this water shed. We have for years tried our best to destroy their habitat and we have the ability to reverse this trend. They need more water!!!

2- There is not study for flows needed for all recreational users. There are new and improved boater access as well as possible new access on the Spokane River. This will lead to more people using the river than ever. It makes no sense to improve river access with out the water necessary to use it.

3- If I understand correctly Idaho can take all water not claimed under Washington's flow rule. This makes absolutely no sense. Water is

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John

Townsell

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LETTER II ATTEMPTED TO SEND
THE DEPARTMENT OF ECOLOGY
SENT ON THEIR FORM (Comment
Form for Chapter 173-557 WAC Draft
Rule and Chapter 173-555-010 WAC
Draft Rule Amendment) Enter your
contact information and rule input in
the following form blanks and submit to
Ecology:) Subject: Spokane River
Instream Flow Rule I believe that the
Department of Ecology should not
adopt the current proposed rule and
instead undertake studies to determine
the optimal flows for fish and
recreation. Ecology must also assess
how the instream flow rule will affect
future interstate allocation with
Idaho. As a Washington State citizen, I
care deeply about what happens to our
waters in the state, especially flowing
streams and water allocations. In this
capacity, I do care about the Spokane
River. I believe that the Department of
Ecology is proposing summer season
flows that do not have a sound
biological basis to protect redband
trout, the Spokane River's

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signature wild fish and other resident
fish. I believe that the Department of
Ecology has failed to study recreational
flows, despite the Spokane River's
tremendous popularity with boaters
and the needs of the inhabitants of the
stream such as fish. These studies are
needed! I do not believe that Idaho
should take all water that is not
claimed in Washington's flow rule.
Ecology needs to assess the Interstate
allocation implications of its flow
rule. Right now, we have the chance to
apply sound scientific principles to the
water situation regarding the Spokane
River. Lets do it! Please do not
shortchange the area residents, the
recreational users and the fish and
other inhabitants of the Spokane
River. Thank you. John
Townsell
PROBLEM: When I submitted
the above message, twice I
received: "error" : true, "message" :
"Internal error", "status" : 500 This is
Sunday evening so I don't expect to be
able to reach the contact shown: "If
you are having problems with this form,

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Dan

Nelson

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Recreational boating, rafting and angling are huge economic drivers in Washington State and the Spokane River area is a vital part of that. Even more importantly, the Spokane River is "for the time being" an important native fishery.

The Department of Ecology proposed summer season flows do not have a sound biological basis to protect redband trout, the Spokane River's signature wild fish. For this reason alone, the proposal needs to be scrapped and started anew with a focus on SCIENCE.

As for recreational river needs, the Department of Ecology completely failed to study recreational flows, despite the Spokane River's tremendous popularity with boaters. These studies are needed! Recreation is one of the largest economic drivers in the state and ECY's proposal is basically hamstringing the economy.

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Dawn

Spickler

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Dump this plan and start fresh to develop a proposal based on sound science and rational thought.

Dear Ms. Wessel,

I am concerned about the proposed river flow recommendations for the summer months. 850 cfs seems very low to me and could impact the use and quality of the river. Our water resources are precious, to say the least, and need to be monitored carefully.

As our population increases, learning how to share resources is essential.

There are many ways businesses and citizens can be educated on how to conserve water use so that the river can continue to support plants, fish and sustain a healthy environment. With all the social media available nowadays communicating the urgency of protecting the environment is easier than in the days of paper mailings.

Please reconsider the recommended

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Keith

Stracchino

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river flow for the summer months.

Make it safe for the ecology of the river.

Thank you.

Dawn Spickler

406 S. Coeur d'Alene St.

Spokane WA

Dear Madam,

while I realise that negotiating this type of inter-state agreement is always a very contentious business I wish to comment that the minimum specified flow at 850 cubic feet per second is extremely low for the Spokane river. I believe that the analysis of needs has proposed a very inadequate number and that the analysis needs to be revisited in order to provide for a larger and more realistic minimum flow. I live near the Spokane River in the City of Spokane Valley, at the height of summer, the stream flow is already so low that large portions of the river bed within the city of Spokane become above water level. We cannot permit a statutory reduction in what is already a

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D.D.

Markwardt

Jim

Rutherford

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latent water supply problem for the second largest urban conurbation in the State of Washington.

Thank you for your attention to this matter.

Keith V Stracchino

Dear Persons:

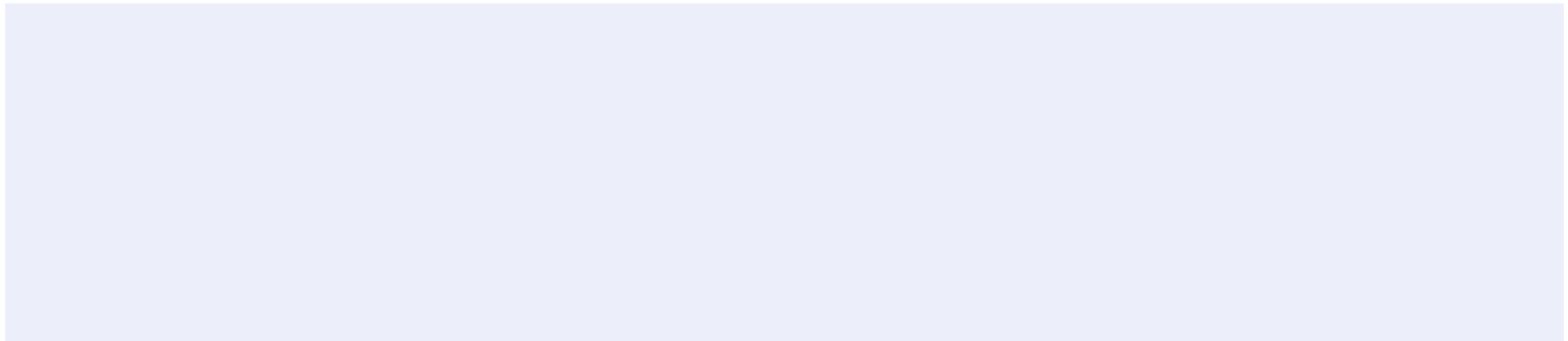
Scientists have determined that 2,500 is the minimum flow necessary for the Spokane River to sustain viable aquatic life and recreational opportunities for Eastern Washington residents. Scientists that have been educated in marine biology and fisheries are more knowledgeable than politicians in determining the necessities of aquatic life. Please enforce the 2,500 minimum flow as recommended by our scientific advisers. Dr. D. D. Markwardt, Spokane

Dear Ms Wessel,

The Spokane river is lifeblood of our

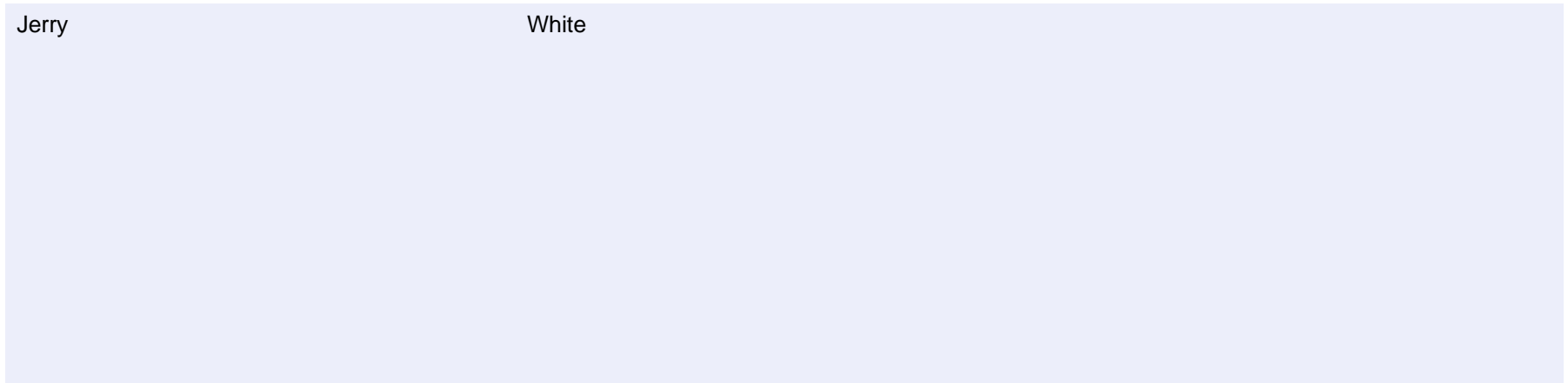
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Renee

Roehl



Jerry

White

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area and if the water flow is too restricted it will kill fish and wipeout much of the progress we have made with reclaiming this incredible natural resource. This river needs protecting, much more than Avista does. Please work to keep the minimum over 2500 cfs. It's a river, not an irrigation ditch. Thank you, Jim Rutherford

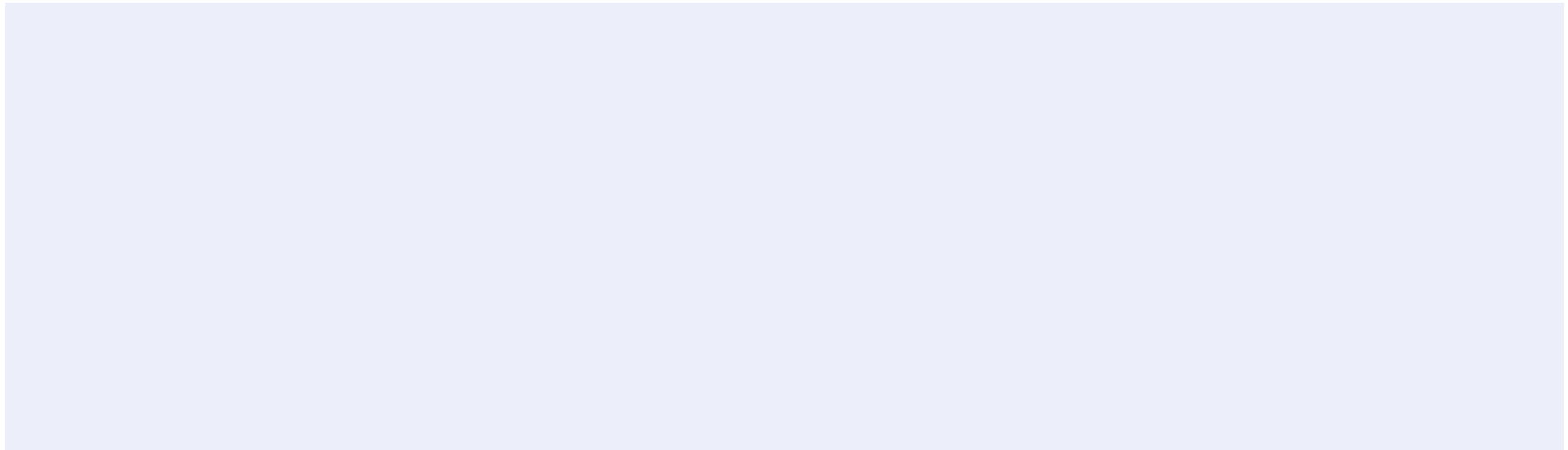
The proposed flows are unacceptable. The proposed flows are way too low. Recommend a flow of 2,500 cubic feet per second during summer months as a flow that will protect fish, boaters, and businesses that depend on the river (the state is proposing a mere 850 cfs).

Dear Ann Wessel,

I am writing to let you know that the Spokane River needs more than 850 cfs water in the summer. Few cities are blessed with a beautiful river that runs through its center, but Spokane not only has the river, but a large aquifer that trades water along the rivers course. This of course provides

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Julia

Glover

Sierra Club

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the cold temperatures that make for a trout fishery. So excellent fishing, interesting scenery and rapids for fine boating and deep holes and public access for swimming -- please provide more than a trickle of water in the summer to support this recreation.

Peace, Jerry White
2822 E. Snowberry Ln
Spokane, WA 99223
509-747-7637

Nov 3, 2014

Director, Washington State
Department of Ecology Maia Bellon

Dear Director, Washington State
Department of Ecology Bellon,

PLEASE DO SOMETHING ABOUT
THIS!!!!!! The Spokane River is one of
Washington's most important rivers.
During hot summer months, thousands
of people turn to the river for relief and
recreation. Fish and wildlife depend on
this river: water is life.

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Setting summertime flows at 850 cfs would be a debacle for the Spokane River -- and risk rivers statewide. The Department of Ecology failed to analyze flows needed for recreational use of the river. The proposed flow does not have a sound biological basis to protect redband trout, the Spokane River's signature wild fish.

By low-balling the flow, Washington State is effectively giving away the river to Idaho the upstream state that will claim all water not protected by Washington's flow rule.

For the Spokane River, no flow rule is better than a bad rule. I ask that you either set the summertime low flow at the protective level of 2,500 cfs, or withdraw the rule altogether.

As goes the Spokane Rivers, so goes the other rivers of Washington State. Please take steps to protect this

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Arthur

Scherer

W Thomas

Soeldner

Systems Coaching LLC

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important river.

Sincerely,

Ms. Julia Glover
7292 Maxwellton Rd
Clinton, WA 98236-8814
(360) 579-3665

Please consider reevaluating this rule.
For fish health, recreational use, and to
help mitigate Idaho upriver water use, I
favor keeping the minimum April, May
, June flow higher than 10,000 cfs and
the July, Aug, Sept minimum flow
between 900 and 1200 cfs as possible
depending on the various controlling
factors.

The Department of Ecology has done a
disservice both to Spokane and to the
State of Washington with its proposal for
minimum instream flow of 850 cfs for
the Spokane River. Ecology failed to
do a thorough study of various
elements that should have been of
importance in their consideration, and
the biology of fish which was
considered, was not thoroughly

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investigated.

Ecology's own rule, WAC 173-557-01, indicates that the "authority and purpose" of the instream flow rule-making is designed to: "protect and preserve fish, wildlife, scenic, aesthetic, recreational, water quality, and other environmental values; navigational values; and stock watering requirements." Yet the thousands of Spokane's citizens who enjoy the river for fishing, tubing, kayaking, canoeing, rafting and for its aesthetic and scenic values were not consulted nor did their enjoyment of the river seem to be considered. The DOE did not reach out to the huge community of people including private associations of river users and recreational businesses who depend on the river flows in order to operate and who are an important part of the economic fabric of Spokane.

Nor does tourism seem to have been considered. The "Small Business Economic Impact" did not even

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Wes

McCart

Stevens County Commissioners

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See attached letter

[C:\Spokane
rule\Stevens
County
Commissioners
comments.pdf](#)

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John

Steve

Solberg

Jerry

White

Spokane Riverkeeper-Center for Justice

leonard

parks

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You can use this area to provide your comments.

If you have input about a specific section of the draft rule, please check the box(s) above.

If you prefer to attach a comment letter use the Attach File option, below.

Allowing the river level to drop as low as 850 cfs will definitely have an impact on the fish population. It will be very detrimental to the native redband trout along with all of the other fish species. That level is just too low, 1000 cfs should be the minimum.

See attached letter

<C:\Spokane rule\Spokane Riverkeeper comments.pdf>

I'm opposed to any reduction of instream flows in the Spokane river below the existing rate. The native Redband trout is a resource and contributor to biological diversity in this area. The river is also a resource that provides kayakers with recreation in close proximity to Spokane. In short, the river is a key factor in the quality of

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Heather

Burford

Amy

Cannata

Ms.

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the river is a key factor in the quality of life to all who live in and visit Spokane.

The over allocation of rivers through out the west, and the resultant negative impacts on those rivers, is well documented.

Future growth and development in this region isn't worth the negative impacts it has on the river and aquifer. Save our river!

Please keep the flow levels above 1000cfs during low flow to ensure that wildlife and recreation alike are not hindered on our beloved river.

I am very concerned that the minimum flows will not be enough to sustain the Spokane River's fish population. The Spokane River is home to its own native Redband trout, which is already struggling due to the pressures of nonnative fish, pollution and development.

Please alter the minimum flows. Even 1,000 cfs is too low. Protect our fish!

You can use this area to provide your comments.

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tamara

holyoak

Mark

Steward

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If you have input about a specific section of the draft rule, please check the box(s) above.

If you prefer to attach a comment letter use the Attach File option, below.

You can use this area to provide your comments.

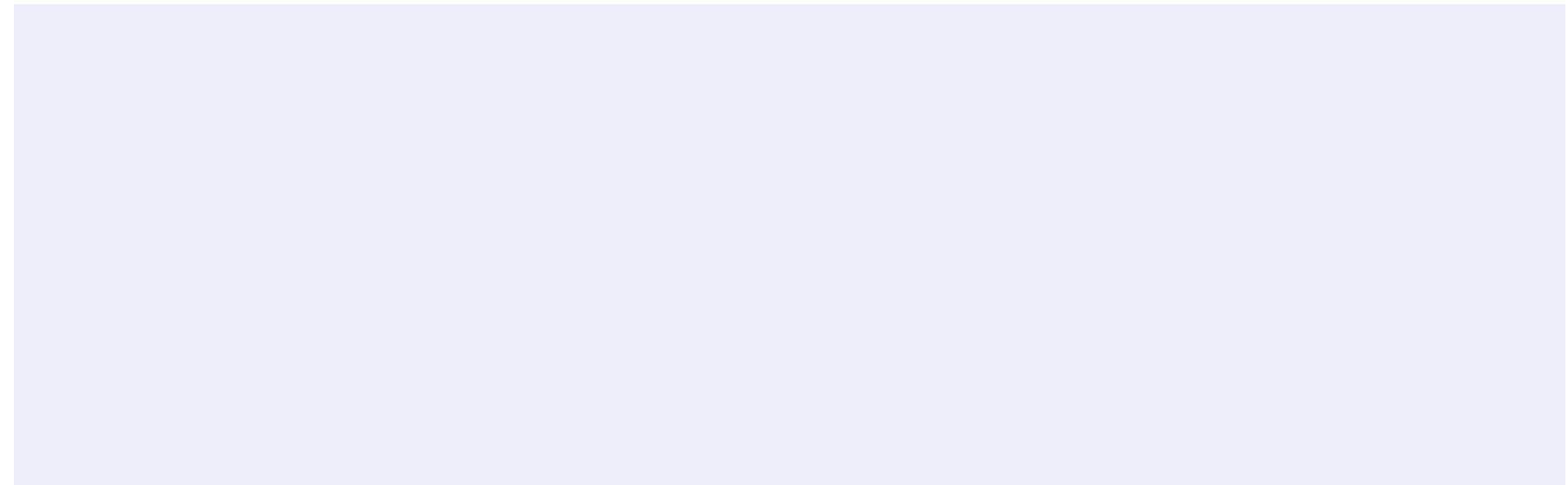
If you have input about a specific section of the draft rule, please check the box(s) above.

If you prefer to attach a comment letter use the Attach File option, below.

I'm a resident of Spokane, a conservationist, and a frequent paddler on the Spokane River. I understand you are proposing a minimum flow of 850cfs for the Spokane River. I believe this flow is way too low for the Spokane River. Anything below 1000cfs is difficult to navigate in anything but a kayak. In fact, at 850cfs I'd probably stay away from the river because it's too low to enjoy. I'm also concerned that dissolved oxygen levels may be far too low at 850cfs for a vigorous and healthy fishery, like the Spokane River.

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Ann

Fackenthall

self

Becky

Beacham

Peak 7 Adventures

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I suggest a minimum flow of 2000cfs.
With proper management, coordination
with the dams and Idaho, as well as
water utility conservation, property and
business conservation and progressive
water rates, this goal can be met.
Please 'think big' for our river. Big
water, big waves, big fish. We love it
and it's a treasure.

Sincerely,

Mark Steward

It is imperative that the water mitigation
plan be in place prior to enacting the
revised instream flow rules within
Chapter 173-557 WAC.

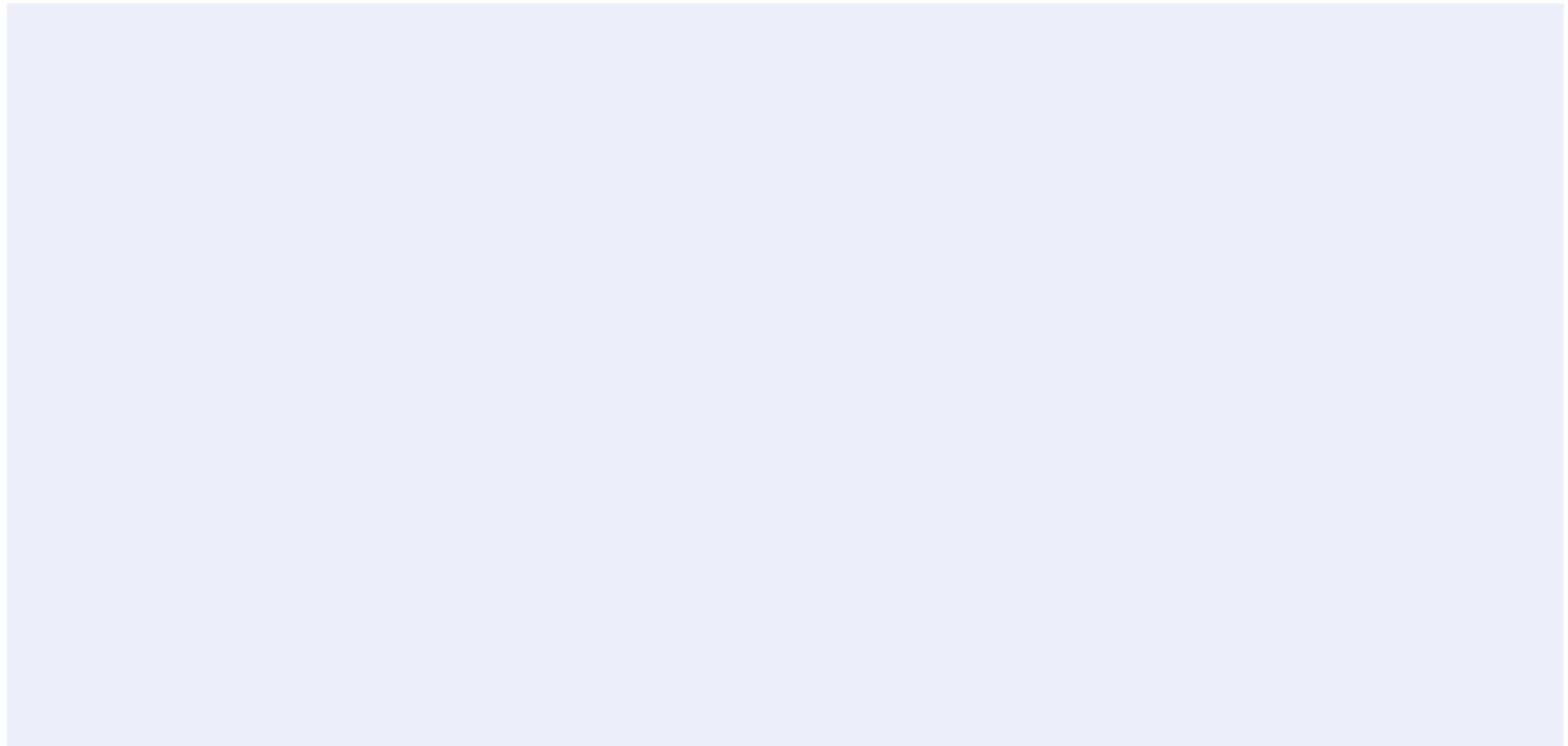
Mapping of the aquifer boundary
changes are also a problem. The well
logs shown on Plate 1 of report 2007-
5041 show no well logs within the
Stevens Co. Boundary.

Hello,

My name is Becky, and I am the rafting
coordinator for Peak 7 Adventures. Our

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Lynn F.

Wells

self

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goal is to provide experiences for youth labeled 'at-risk' that will challenge them to realize their greater potential.

Our main rafting season is April through the first week of June, but we also provide float trips and canoe trips on the Little Spokane River through August.

As you plan for the future, please consider our programs: if the water level of the Spokane River drops below 2,000 cfs in the summer months, we will not be able to serve the youth of Spokane via our water activities.

Thank you for your consideration,

--Becky

There is a definition for mitigation. It is necessary to have the mitigation in place before the instream flow rule is enacted.

The Boundary that extends into

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William

Wagstaff

Keith

Kutchins

Upper Columbia United Tribes

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Stevens Co. as shown in Plate 1 of the 2007-5041 and 5044 reports shows the well log in alluvial gravels in Spokane Co. and may not be representative of the boundary into Stevens Co. portion.

I would encourage the Dept. of Ecology to consider a higher minimum instream flow for the Spokane River. A flow of 850 cfs does not provide for a very scenic river, adequate fish and wildlife habitat, or a minimum flow for rafters and other river users. It in essence barely keeps the river wet! A minimum flow of 2500 cfs would do a much better job of addressing these considerations and providing for the health of this community asset.

The UCUT requests that Ecology include future instream flows for anadromous fish reintroduction - based on broad regional support for reintroduction contained in the Columbia River Treaty Regional Recommendation (12/13, 2013); the Northwest Power and Conservation Council 2014 Columbia River Basin Fish and Wildlife Program (10/8/14);

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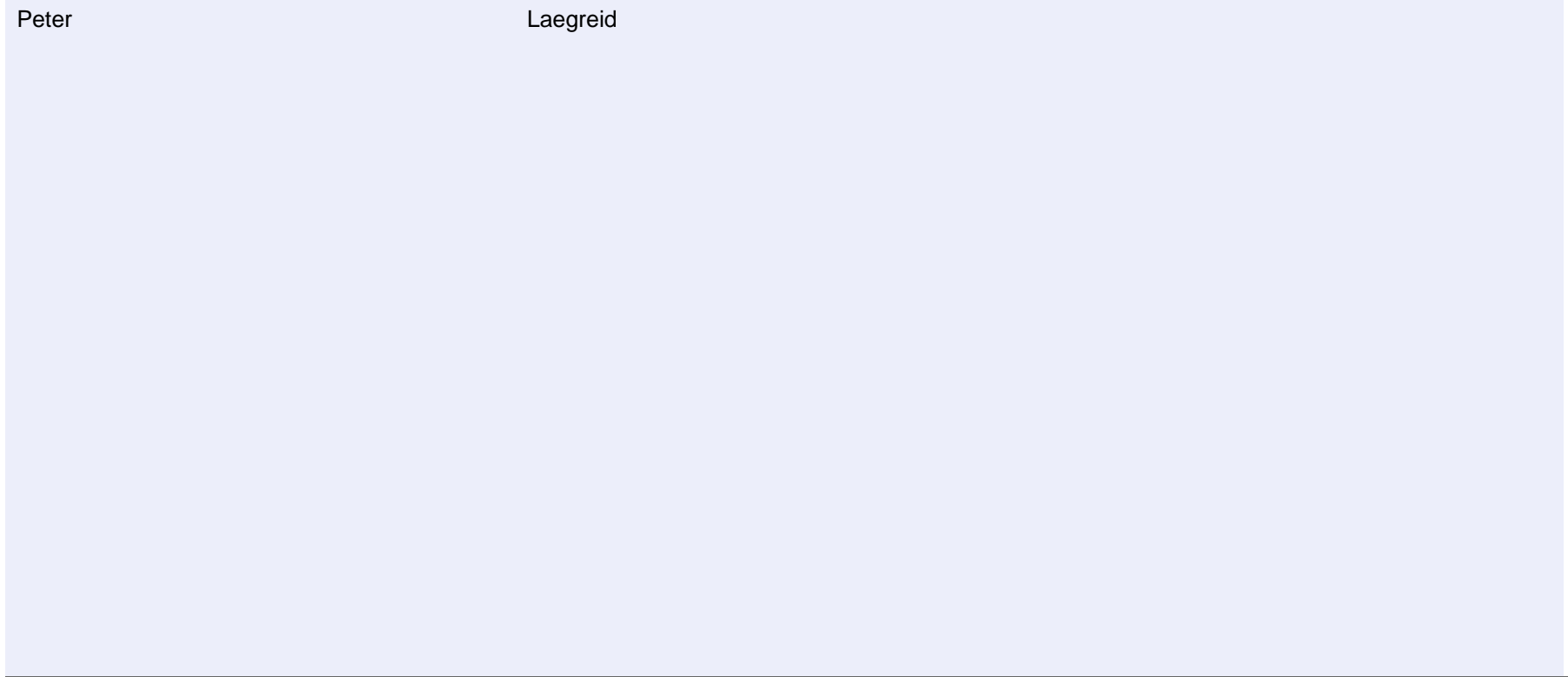
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Peter

Laegreid



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and the City of Spokane Resolution
#2014-0070 (7/7/14).

You can use this area to provide your
comments.

If you have input about a specific
section of the draft rule, please check
the box(s) above.

If you prefer to attach a comment letter
use the Attach File option, below.

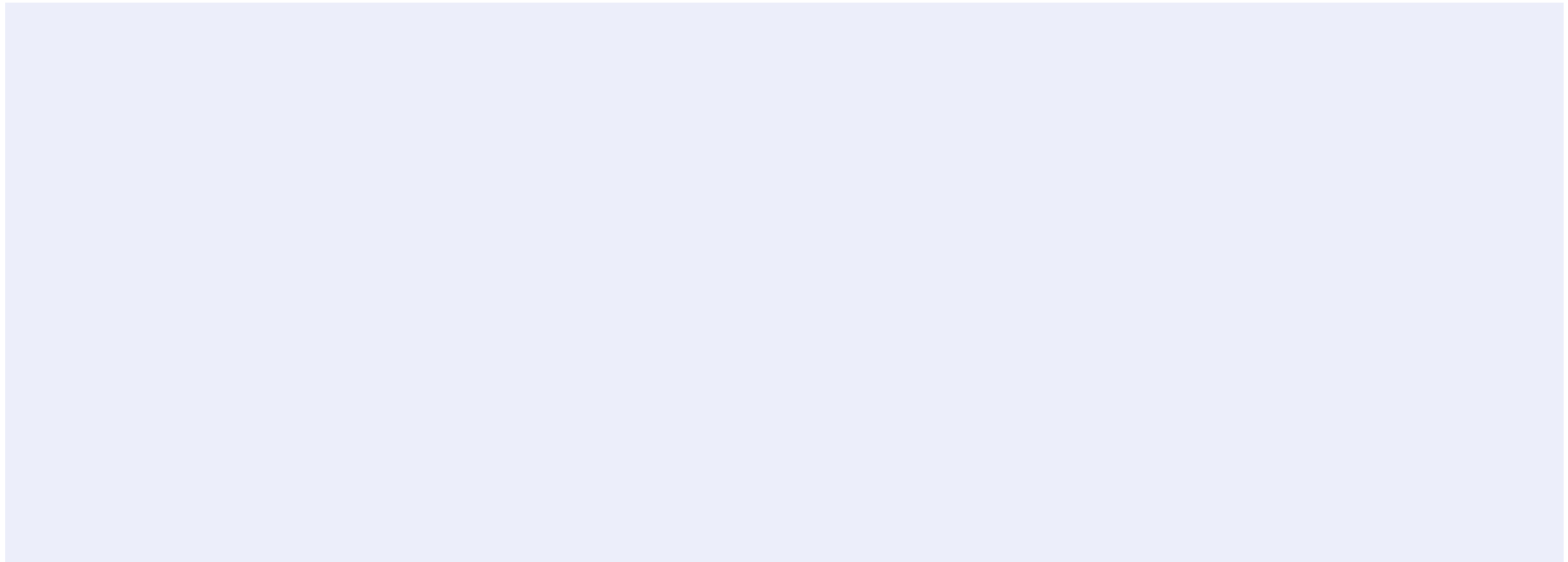
The Spokane River is one of
Washington's most important rivers.
During hot summer months, thousands
of people turn to the river for relief and
recreation. Fish and wildlife depend on
this river: water is life.

Setting summertime flows at 850 cfs
would be a debacle for the Spokane
River -- and risk rivers statewide. The
Department of Ecology failed to
analyze flows needed for recreational
use of the river. The proposed flow
does not have a sound biological basis
to protect redband trout, the Spokane
River's signature wild fish.

By low-balling the flow, Washington

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Bjorn

Ostby

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State is effectively giving away the river to Idaho the upstream state that will claim all water not protected by Washington's flow rule.

For the Spokane River, no flow rule is better than a bad rule. I ask that you either set the summertime low flow at the protective level of 2,500 cfs, or withdraw the rule altogether.

As goes the Spokane Rivers, so goes the other rivers of Washington State. Please take steps to protect this important river.

As an avid fisherman and floater on the Spokane River, I am strongly against the decreased minimum flow on the Spokane River. As it stands, the flows already lead to fairly high summertime temperatures, which has an adverse effect on the native resident Redband trout populations. Hey minimum flow of 850 CFS would lead to even higher temperatures, a greater concentration of fish in less holding water, and a waterway that becomes very difficult to

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Grant

Williamson

Tom

Goodner

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navigate. For the benefit of the fish in the river and for the users of the river I am urging you to think twice about decreasing the minimum flow of the Spokane River. Thank you.

I am concerned that Idaho's water right permitting practices in Idaho's Basin 95 combined with Washington State's low proposed inflow requirement of 850 cfs will lead to environmental consequences in Washington state.

The Department of Ecology is proposing summer season flows that do not have sound biological basis to protect redband trout, the Spokane River's native wild fish. They need to base any decision on sound studies as what flows are needed to maintain and improve fish habitat.

The Department of Ecology completely failed to study recreational flow, despite the Spokane River's tremendous popularity with boaters. There are new boat access points on the river and more planned which will translate to more use of the river for all

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Melissa

Bates

Aqua Permanente

Bruce

Howard

Avista Corp.

Rachael

Osborn

CELP - Sierra Club

Rachael

Osborn

CELP â€“ Randall Travel Marketing

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forms of recreation. These studies are needed as well.

Idaho can take all water not claimed under the proposed Washington's flow rule. Ecology needs to assess the interstate allocation implications of its flow rule.

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rule\Aqua
Permanente
Spokane
River.pdf](#)

See attached letter

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rule\Avista
comment.pdf](#)

See attached letter

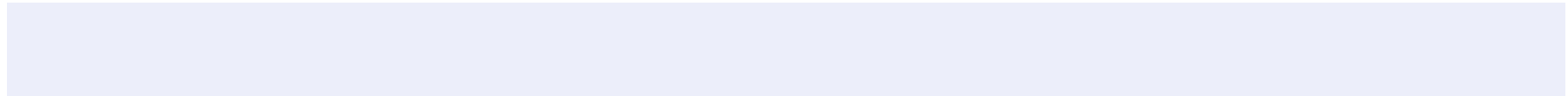
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Sierra Club
comment
letter.pdf](#)

See attached

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Randall Travel](#)

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Jerry

Clark

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[Randall Travel
Marketing.pdf](#)

Dear Director Belton: The proposed flow rule of only 850 cubic feet per second (cfs) is dangerous in many ways and should either be raised to at least 2500 cfs or eliminated altogether. Particularly in the summer, the River is an important recreational attraction not only to people of the area, but also many visitors who contribute to the economy. Such a low flow level would interfere with the enjoyment of those who find it a source of relief and recreation. It is also hard to believe that it would not harm the fish and wildlife that depend on the River for survival. Further, it would surely affect in a negative way other rivers and streams in the region. I do not live in Eastern Washington, but I have family and friends who do. The Spokane River is part of what makes the area an attractive place to want to spend a vacation and visit relatives. I hope you will give serious consideration to my recommendation that the proposed

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Stewart

Wilder

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recommendation that the proposed rule be dramatically changed to save the River and address the interests of those who depend on it, including fish & wildlife. Alternatively, you might consider dropping the flow rule altogether. Jerry Clark 1939 Calvert Street NW Washington, D.C. 20009

Dear Director Bellon - As a river recreationist and fly fisherman, I wanted to comment on reduced water flow rulings that must be studied thoroughly in order to protect and preserve the ecosystems that are dependent on adequate water flows.

The Spokane River is one of Washington's most important rivers.

During hot summer months, thousands of people turn to the river for relief and recreation. Fish habitat and wildlife depend on this river and with low flows increased temperature and impacts on biological and ecological sustainability for life in the waters would be in jeopardy: water is life. Setting summertime flows at 850 cfs would be a debacle for the Spokane River -- and

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John

DeVoe

WaterWatch of Oregon

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risk rivers statewide. The Department of Ecology failed to analyze flows needed for recreational use of the river. The proposed flow does not have a sound biological basis to protect redband trout, the Spokane River's signature wild fish. By low-balling the flow, Washington State is effectively giving away the river to Idaho, the upstream state that will claim all water not protected by Washington's flow rule. The discussions should involve all stakeholders in the flow between states or border countries when involved. For the Spokane River, no flow rule is better than a bad rule. I ask that you either set the summertime low flow at the protective level of 2,500 cfs, or withdraw the rule altogether. As goes the Spokane Rivers, so goes the other rivers of Washington State. Please take steps to protect this important river. Stewart Wilder 5684 E. Gateway Dr. Boise, ID 83716
Dear Director Bellon, The Spokane River is one of Washington's most

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important rivers. During hot summer months, thousands of people turn to the river for relief and recreation. Fish and wildlife depend on this river: water is life. Setting summertime flows at 850 cfs would be a debacle for the Spokane River -- and set a poor precedent for rivers statewide. The Department of Ecology failed to analyze flows needed for recreational use of the river. As I understand the proposed rule, the proposed flow does not have a sound biological basis to protect redband trout, the Spokane River's signature wild fish. By low-balling the flow, Washington State is effectively ceding the river to Idaho, the upstream state that will no doubt claim all water not protected by Washington's flow rule. The people and fish of Washington state deserve better. For the Spokane River, no flow rule is better than a bad rule. I ask that you either set the summertime low flow at the protective level of 2,500 cfs, or withdraw the rule altogether. As goes the Spokane Rivers, so goes the other

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Test	Test	
test		
John	Osborn	CELP
Paul	Delaney	Northwest Whitewater Association
Jeff	Lambert	Enviroscience Group

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rivers of Washington State. Please
take steps to protect this important
river and don't set a precedent that will
surely result in degraded and
dewatered rivers elsewhere in the
state. For rivers, John DeVoe
Executive Director WaterWatch of
Oregon 213 SW Ash Suite 208
Portland, Oregon 97204 (503) 295-
4039 Join WaterWatch and help
protect and restore Oregon's rivers
www.waterwatch.org

See attached

[C:\Spokane
rule\Osborn,
John
comments.pdf](#)

See attached letter

[C:\Spokane
rule\Northwest
Whitewater
Association
comments.pdf](#)

Dear Ms. Wessel, Thank you for the
opportunity to comment on the
proposed stream instream flow rule of

Spokane River Instream Flow Rule Comments -- CR102 -- Su

Based on Spokane River Instream Flow Rule Comments -- CR102

Raelene

Gold

Harvey

Morrison

Spokane Falls Chapter of Trout Unlimited

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850 cfs. I request the flows be studied for fish habitat and recreation activities such as paddling. I recommend that fish studies be done and a flow selected that enhances the fisheries in the Spokane River especially the red band trout. The scenic beauty of the River is degraded when flows are lower than 2000 cfs. Maintaining a higher flow level may have impacts on the lake level in Coeur d'Alene Lake. I hope that the Dept of Ecology advocates for a flow level that benefits Spokane and not waterfront owners in Idaho. Thanks, Jeff Lambert 16 E 39th Ave Spokane, WA 99203 509 999-5100
jlambert@envirosiencegroup.com
See attached

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rule\Gold,
Raelene
comments.pdf](#)

See attached letter

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Falls Chapter of](#)

Spokane River Instream Flow Rule Comments -- CR102 -- Su

Based on Spokane River Instream Flow Rule Comments -- CR102

Susan

Drumheller

Idaho Conservation League

David

Monthie

Peter

Grubb

ROW Adventures

Ann

Murphy

League of Women Voters Spokane Area

Andrea

Rodgers

Law Offices of Andrea K. Rodgers Harris

Denise

Smith

Spokane River Instream Flow Rule Comments -- CR102 -- Su

Based on Spokane River Instream Flow Rule Comments -- CR102

[Trout
Unlimited.pdf](#)

See attached letter

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rule\Idaho
Conservation
League
comments.pdf](#)

See attached

[C:\Spokane
rule\Monthie,
David
comments.pdf](#)

See attached

[C:\Spokane
rule\ROW
Adventures
comments.pdf](#)

See attached letter

[C:\Spokane
rule\League of
Women Voters
Spokane Area
comments.pdf](#)

See attached letter

[C:\Spokane
rule\Rodgers,
Andrea
comments.pdf](#)

See attached letter

Spokane River Instream Flow Rule Comments -- CR102 -- Su

Based on Spokane River Instream Flow Rule Comments -- CR102

Cal

Osborn

Jan

Sharar

Spokane River Instream Flow Rule Comments -- CR102 -- Su

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Denise
comments.pdf](#)

See attached

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rule\Osborn,
Cal
comments.pdf](#)

As a middle school, high school and college student from Spokane, I had numerous opportunities to enjoy the Spokane River. I was aware then, back in the 60â€™s and 70â€™s, as I am now, the Spokane River can be a healthier river for humans and other animals if we take the time to make the right decisions and take the right steps to enhance this beautiful river. To that end, it is necessary to 1/ study flows to support recreation and enhance river beauty,, 2/ direct fish studies to better address the unique habitat needs of the redband trout which is imperative to recovery of fish runs in the Upper Columbia River system, and 3/ assess the rules potential impacts to interstate

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Timothy

Ibbetson

Paula

Mackrow

Nancy

Rust

Thomas

O'Keefe

American Whitewater

Spokane River Instream Flow Rule Comments -- CR102 -- Su

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water allocation schemes. Please
rethink this rule in its current form and
take the time to do it right! Most
sincerely, Jan Sharar Sent from
Windows Mail

See attached

[C:\Spokane
rule\Ibbetson,
Timothy
comments.pdf](#)

[C:\Spokane
rule\Mackrow,
Paula
comments.pdf](#)

Chris Anderson suggested I email you
because the form rejected my zip code
of 98101. Here is what I tried to send:
I have seen the pictures from Celp that
show how low the water flow is in the
summer. I understand that your
proposed rule will have a flow even
lower than that. I urge you to adopt a
rule that will provide enough water for
both fish and recreation. Nancy Rust
900University St. Apt 701 Seattle WA,
98101

See attached letter

[C:\Spokane](#)

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Mike

Petersen

Lands Council

Celene

Olgeirsson

Spokane Canoe & Kayak Club

Steve

Parker

David

Monthie

Spokane River Instream Flow Rule Comments -- CR102 -- Su

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rule\American
Whitewater
comments.pdf](#)

See attached letter

[C:\Spokane
rule\Lands
Council
comments.pdf](#)

[C:\Spokane
rule\Spokane
Canoe & Kayak
Club
comments.pdf](#)

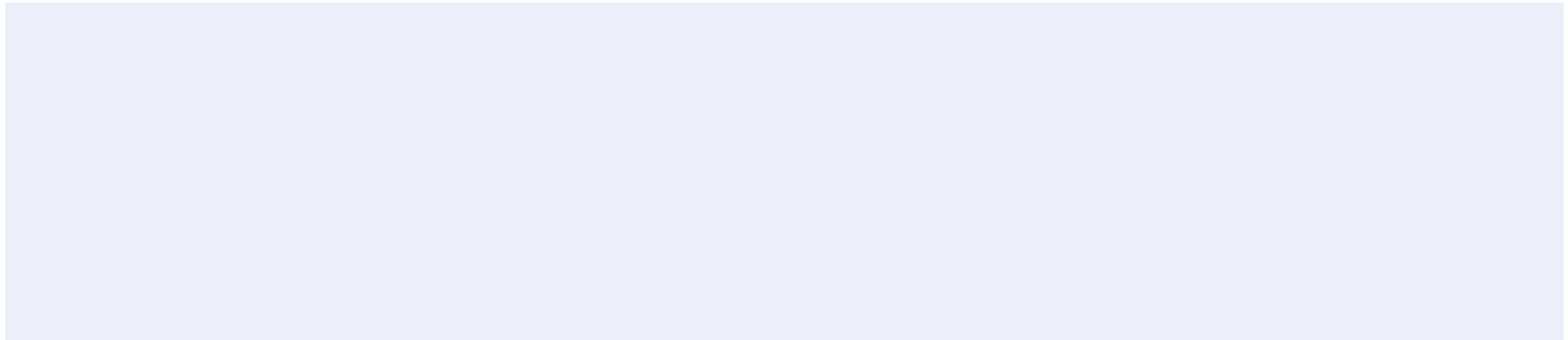
Hello there, Please consider
maintaining a minimum flow of 2000-
2500 for this river throughout as much
of the year as possible. This river has
fantastic recreational opportunity.

Thanks, Steve Parker

In order to be consistent with state law
and what I believe to be in the
Spokane watershed plan, you should
include in your identification of
potential new sources the use of
reclaimed water for purposes
authorized under state law, and should

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Marny

Lombard

Sierra Club

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require evaluation of their availability
before issuing new permits, or allowing
new uses, for nonpotable purposes.

Dave Monthie “Whether we and
our politicians know it or not, Nature is
party to all our deals and decisions,
and she has more votes, a longer
memory and a sterner sense of justice
than we do.” Wendell Berry

Nov 7, 2014 Director, Washington
State Department of Ecology Maia
Bellon Dear Director, Washington
State Department of Ecology Bellon,
Please, please do not strangle our
Spokane River with a summertime flow
of 850 cfs. This is unconscionable. The
river is a lifeline for wildlife in our
region. As well, it is a widely used
recreational asset for people --
including many working class citizens
of Spokane who cannot afford a cabin
at the lake. I walk daily, year-round, by
the Spokane River east of Minnehaha
Rocks. I see deer along Upriver Drive -
they depend on the river for their
water. I also see deer swim the river
early in the summer, headed for an

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Samantha

Mace

Scotty

Cornelius

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alfalfa field nearly Felts Field Airport.

It's not widely known, but beaver also use the river there. Every year, the resident bald eagles in that area raise young ones. In summer, they are ready to begin hunting. We often see them perched in the Ponderosas overlooking the river. You don't see trout in that stretch, but upstream you do. I

understand that the river must satisfy multiple uses - but 850 cfs is shameful.

Documents from your own department (Spokane River Geographic Response Plan) refer to an August/September base flow of approximately 1,750 cfs.

Please do the right thing - and protect the Spokane River! Sincerely, Marny Lombard 8013 E. Heroy Spokane WA 99212

See attached

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<C:\Spokane rule\Cornelius, Scotty>

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Based on Spokane River Instream Flow Rule Comments -- CR102

Norman

MacLeod

Gaelic Wolf

Claude

Kistler

Shirley

Nixon

Sierra Club

Spokane River Instream Flow Rule Comments -- CR102 -- Su

Based on Spokane River Instream Flow Rule Comments -- CR102

[comments.pdf](#)

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comments.pdf](#)

I am very concerned about the Department of Ecology instream summer flow recommendations (850 fcs) for the Spokane River. This flow level is insufficient for a fishing, swimming and boating in the river. The Spokane River deserves flow recommendations that truly protect our river. I urge you to dialogue with the Spokane Chapter of Trout Unlimited and Spokane River Keeper to address this critical issue. Respectfully, Claude Kistler 1124 E 34th Ave Spokane, WA. 99203 Sent from my iPad

Nov 5, 2014 Director, Washington
State Department of Ecology Maia
Bellon Dear Director, Washington
State Department of Ecology Bellon,
The Spokane River should be
protected with a state flow rule that will
prevent summertime flows from
dipping below 2500 cfs. The flow

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Jon

Wilmot

FLOW Adventures

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regime in the proposed rule is a shocking dereliction of Ecology's duty to protect the public's water resources.

I ask that you either set the summertime low flow at the protective level of 2,500 cfs, or withdraw the rule altogether. Please take steps to better protect this and other important rivers throughout Washington. Sincerely,
4540 8th Ave NE Apt 2305 Seattle, WA 98105-1708

Ann, I read your statement about small business impact on the river. I believe the impact of a min. flow of 850 on the Lower Spokane would definitely impact my business as a river outfitter on the Spokane river. Department of Ecology did not consider the 5 commercial companies or the two universities that use this stretch of water in their small business impact statement. In my opinion, water rights with the state of Idaho will become a huge issue in years to come. The department of ecology is setting the river flows way to low. I don't understand where or how you chose 850 CFS? A more

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Based on Spokane River Instream Flow Rule Comments -- CR102

Kari

Moore

Spokane River Instream Flow Rule Comments -- CR102 -- Su

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realistic level would be around 3500.

Thanks, Jon Wilmot Owner FLOW

Adventures 509.242.8699 Office

509.389.1221 Cell jtwilmot@flow-

adventures.com [adventures.com](http://www.flow-</p></div><div data-bbox=)

There are two

kinds of adventurers: those who go

truly hoping to find adventure and

those who go secretly hoping they won

t. Rabindranath Tagore

Even lower flow than 2500 cfs? In the

summer? 850 cfs? Wow- it's

interesting that we want to encourage

people to use and take care of the

river, yet if there's no water flowing,

how can that happen? I have enjoyed

kayaking the Spokane river for the past

3 years. In fact a group of my

kayaking friends and I run it 4 -5 times

a week during the summer! We also

make a point to pick up garbage and

do other things like cover graffiti to help

keep our river beautiful. If there's no

water in the river, there's no kayaking

to be had, which will make us VERY

sad little paddlers! Please keep more

water flowing so we can continue to

Spokane River Instream Flow Rule Comments -- CR102 -- Su

Based on Spokane River Instream Flow Rule Comments -- CR102

Ann

Aagaard

Jim

Briggs

Daniel

Schafer

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Based on Spokane River Instream Flow Rule Comments -- CR102

enjoy this great gem that is in the
middle of our city. Thank you, Kari
Moore

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Ann
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rule\Bates-
Briggs
comments.pdf](#)

Ms. Wessel, I am an active whitewater boater living in Spokane and I am concerned about river flows both from a boating and aesthetic viewpoint. I am most concerned that the Department of Ecology did not involve the boating community in itâ€™s study of, and recommendation for ongoing river flows. This is an oversight that must be addressed before any permanent decisions are made for our river. Thank you for your attention to this matter. Daniel J Schaffer 3319 W 23rd Ave Spokane, WA 99224 509-939-1205

Spokane River Instream Flow Rule Comments -- CR102 -- Su

Based on Spokane River Instream Flow Rule Comments -- CR102

Roger

Bertsch

Julie

Titone

Sierra Club

Jake

Reed

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Ann, our family moved to Spokane after I retired from the Navy in 1993. I have been a regular user of the Spokane River for fly fishing and kayaking. The proposed minimum flow of 1000 cfs is below the minimums to sustain a healthy population of Native Red Band Trout and is insufficient to permit recreational water sports. I would recommend a minimum flow of 2,000-2,500 cfs as good number supported by scientific evidence to sustain the fishery and permit recreational use of the river. The Spokane River is a true treasure to the region as a stewards of the local environment we need to to move to protect and enhance this valuable resource. Thank you, Roger B. Bertsch
3606 W Washington Rd Spokane, WA
99224

See attached

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rule\Titone,
Julie
comments.pdf](#)

Just wanted to put my 2 cents in on the proposed plan for the Spokane river

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proposed plan for the Spokane river flows. I am a avid whitewater kayaker who frequently uses the Spokane river for recreational purposes year round. I use the upper Spokane from Harvard to Mirabeau as well as the lower portion of the river from the TJ Menach bridge to Plese flats. As far as the flows on the lower Spokane I feel that the proposed flow of 850 cfs is much to low. In a small kayak I feel 1200 cfs is about as little volume of water needed to get through certain spots of the river. As far as larger vessels like rafts and catamarans probably need closer to 2000-2500 cfs to safely navigate the river. The spring time brings us some great whitewater when the river is 20,000-30,000 cfs as well! I feel like the proposed plan would be very detrimental to the entire whitewater community, and could potentially ruin one of the greatest assets we have in this region which is right in our back yard. I hope there will be lots of thought put into this decision with the input from all parties that will be

Spokane River Instream Flow Rule Comments -- CR102 -- Su

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Chuck

Grider

Derrick

Knowles

Out There Monthly

Sean

Visintainer

Silver Bow Fly Shop

Amanda

Parrish

Lands Council

Kim

Abel

League of Women Voters of Washington

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affected. I believe there can be a
compromise to make the right decision
for everyone. Thank you for your time.

Jake Reed Spokane Valley WA 509

999 1422 Sent from my Verizon

Wireless 4G LTE smartphone

See attached

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Chuck
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See attached

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rule\Knowles,
Derrick
comments.pdf](#)

See attached

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rule\Visintainer,
Sean
comments.pdf](#)

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Amanda
comments.pdf](#)

See attached letter

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Women Voters](#)

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Chris

Kopczynski

Kop Construction Co. Inc.

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[of Washington
comments.pdf](#)

Ann, I am writing in protest of the proposed "in stream flow rule" base flows for the Spokane River. The proposed flows for June 16th to September 30th of 850cfs are far, far too low. I have lived in Spokane for sixty "six years, and have seen these water flows diminish every year. I live right on Latah Creek, which flows into the Spokane River on the West side of Spokane. The demand for water usage from Latah has practically dried up the water flow in summer months, so it is virtually a trickle of Spring water. Historically, this is a far cry from just ninety years ago when Chinook salmon used to spawn in both the Spokane River and Latah Creek. I know the future demand for water is only going to increase, but for the planets sake, we are going the wrong direction!! The proposed low flow of 850cfs for summer months in the Spokane River is the opposite of where we, as a planet, should be heading.

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James

McRoberts

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we, as a planet, should be heading.

Keeping a viable waterway not only for ecological values is most important.

Fisherman and recreational users create jobs too! Hopefully the Washington Department of Ecology will reconsider this decision. Chris

Kopczynski President Kop

Construction Co. Inc.

chris@kopconstruction.com

Dear Ms Wessel, please do not adopt the current proposed rule and consider the following points: Problem 1: The Department of Ecology is proposing summer season flows that do not have a sound biological basis to protect redband trout, the Spokane River's signature wild fish. Problem 2: The Department of Ecology completely failed to study recreational flows, despite the Spokane River's tremendous popularity with boaters. These studies are needed! Problem 3: Idaho to take all water not claimed in Washington's flow rule. Ecology needs to assess the interstate allocation implications of its flow rule.

Spokane River Instream Flow Rule Comments -- CR102 -- Su

Based on Spokane River Instream Flow Rule Comments -- CR102

Liv

Andrews

Salem Lutheran Church

Deborah

Di Bernardo

Roast House

Sierra Club

Courtney

Straight

Tupper Mack Wells PLLC

Spokane River Instream Flow Rule Comments -- CR102 -- Su

Based on Spokane River Instream Flow Rule Comments -- CR102

James C. McRoberts 5430 Lake
Washington Blvd SE Bellevue, WA
98006-2643 jim4fish@comcast.net
425-643-2743

As a newer resident to Spokane, I
have fallen in love with the city's
beautiful river. To let its flow drop as
far down as proposed levels suggest
would injure not only wildlife but also
the identity of this place. We find our
selves in these waters as people of this
town. We ask you keep the waters of
the Spokane at high, healthy levels.
Everyone will benefit. Thank you,
Pastor Liv Larson Andrews Salem
Lutheran Church Spokane,
Washington

See attached

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Bernardo,
Deborah
comments.pdf](#)

Ecology received 1,727 copies of the
attached message

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rule\Sierra Club
comments.pdf](#)

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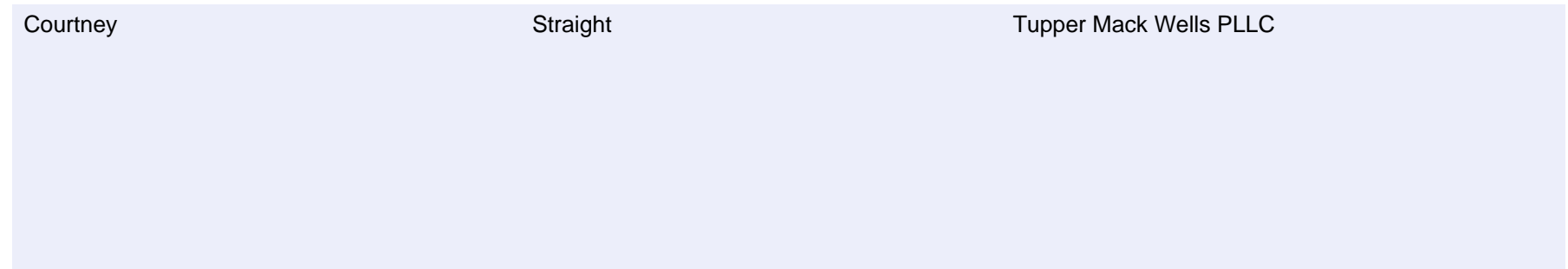
Based on Spokane River Instream Flow Rule Comments -- CR102



Courtney

Straight

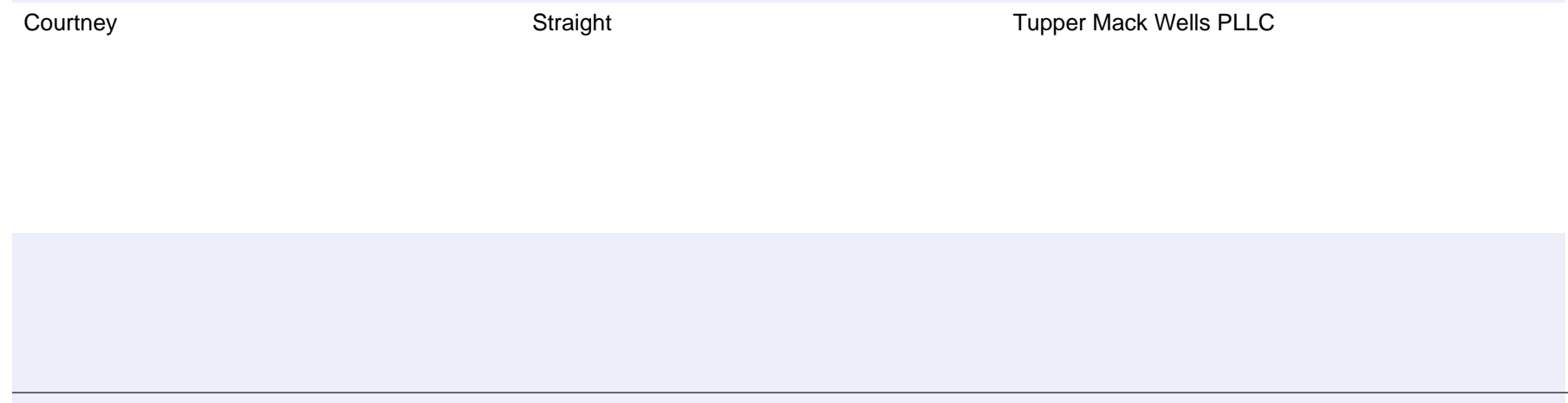
Tupper Mack Wells PLLC



Courtney

Straight

Tupper Mack Wells PLLC



Courtney

Straight

Tupper Mack Wells PLLC

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Implementation
Plan.pdf

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Attached are the transcripts from the
10/22/14 public hearing

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reporter hearing
transcripts 10-

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Based on Spokane River Instream Flow Rule Comments -- CR102



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[transcripts 10-
22-14.pdf](#)